

1 D. Douglas Grubbs (*Admitted PHV*)
Adam K. Pulaski (*Admitted PHV*)
2 **PULASKI KHERKHER, PLLC**
2925 Richmond Avenue, Ste 1725
3 Houston, TX 77098
Telephone: 713-664-4555
4 Facsimile: 713-664-7543
Email: dgrubbs@pulaskilawfirm.com
5 Email: adam@pulaskilawfirm.com

6 *Counsel for Plaintiffs*

7 **UNITED STATES DISTRICT COURT**
8 **NORTHERN DISTRICT OF CALIFORNIA**
9 **SAN FRANCISCO DIVISION**

9 IN RE: UBER TECHNOLOGIES, INC.,
10 PASSENGER SEXUAL ASSAULT
11 LITIGATION

MDL No. 3084 CRB

Honorable Charles R. Breyer

12 This Document Relates to:

**MOTION TO WITHDRAW AS COUNSEL
OF RECORD**

13 *T.C. vs. Uber Technologies, Inc., et al.,*
14 *3:25-cv-02109;*

15 *A.D. vs. Uber Technologies, Inc., et al.,*
16 *3:25-cv-02111;*

17 *A.W. vs. Uber Technologies, Inc., et al.,*
18 *3:25-cv-02401;*

19 *T.B. vs. Uber Technologies, Inc., et al.,*
20 *3:25-cv-02678;*

21 *A.G.L. vs. Uber Technologies, Inc., et al.,*
22 *3:25-cv-02931;*

23 *S.D. vs. Uber Technologies, Inc., et al.,*
24 *3:25-cv-03547;*

25 *T.W. vs. Uber Technologies, Inc., et al.,*
26 *3:25-cv-04414;*

27 *A.G. vs. Uber Technologies, Inc., et al.,*
28 *3:25-cv-04802; and*

T.L. vs. Uber Technologies, Inc., et al.,
3:25-cv-04878

1 Pursuant to Local Rule 11-5, D. Douglas Grubbs of Pulaski Kherkher, PLLC, counsel
2 of record (“Counsel”) for the above-referenced Plaintiffs, respectfully moves this Court for an
3 Order allowing his firm to withdraw as counsel of record in the above-captioned matters.

4 In response to Defendants’ show cause motion (ECF 3604), Counsel reviewed the
5 alleged “non-bona-fide receipts” that Plaintiffs previously provided to Counsel. Relying on
6 Defendants’ representations asserted in ECF 3604, its accompanying exhibits and sworn
7 declarations, Counsel contacted the above-referenced Plaintiffs via email on July 31, 2025.
8 Counsel informed Plaintiffs of Uber’s motion and requested that Plaintiffs provide any
9 additional proof of their ride at issue, *e.g.*, the summary email that Uber typically sends upon
10 ride completion. After his firm attempted calling the above-referenced Plaintiffs the week of
11 August 4th, Counsel sent a follow-up email on August 11, 2025 as well as mailed letters via 2-
12 day Federal Express giving Plaintiffs until August 22, 2025 to provide any additional proof
13 otherwise Counsel would initiate the process of withdrawing as their attorneys. At the time of
14 filing this motion to withdraw, no additional ride receipt proof has been provided by the above-
15 referenced Plaintiffs nor substitute counsel identified.

16 Additionally, during a meet and confer zoom on August 1, 2025 and email confirmation
17 on August 4, 2025, Counsel advised opposing counsel at Shook, Hardy & Bacon as well as
18 Kirkland & Ellis of his firm’s intent to withdraw should the above-referenced Plaintiffs fail to
19 provide additional ride receipt proof. As required by Local Rule 11-5(a), Counsel has provided
20 written notice of Counsel’s intent to withdraw, reasonably in advance, to the above-referenced
21 Plaintiffs as well as opposing parties.

22 WHEREFORE, the attorneys and law firm of Pulaski Kherkher, PLLC respectfully
23 request that they be allowed to withdraw as counsel of record for the above-referenced Plaintiffs.
24 A courtesy copy of this motion will be served upon Plaintiff at their last known address and via
25 electronic mail.
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2 Dated: August 26, 2025

Respectfully submitted,

3 **PULASKI KHERKHER, PLLC**

4
5 /s/ D. Douglas Grubbs

D. Douglas Grubbs (TX Bar No. 24065339)

6 (*Admitted Pro Hac Vice*)

7 Adam K. Pulaski (TX Bar No. 16385800)

(*Admitted Pro Hac Vice*)

8 2925 Richmond Avenue, Suite 1725

Houston, Texas 77098

9 Tel: 713-664-4555

10 Facsimile: 713-664-7543

dgrubbs@pulaskilawfirm.com

11 adam@pulaskilawfirm.com

12 Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on August 26, 2025, I electronically transmitted the foregoing MOTION TO WITHDRAW AS COUNSEL OF RECORD to the Clerk's office using the CM/ECF system for filing thereby transmitting a Notice of Electronic Filing to all CM/ECF registrants. Additionally, the foregoing was served on Defendants' counsel via email at: ubermdlservice@listserv.shb.com.

/s/ D. Douglas Grubbs
D. Douglas Grubbs